

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA, :

Plaintiff, :

v. : Case No. 2:17-CR-00144

E. STANLEY HOFF, : JUDGE WATSON

Defendant. :

UNOPPOSED MOTION TO EXTEND TIME FOR SUBMISSION OF
OBJECTIONS TO THE INITIAL PRESENTENCE REPORT

Now comes Defendant, E. Stanley Hoff, and moves this Court for an Order extending both the deadline for the submission of objections to the Initial Presentence Report for at least thirty (30) days; and, for an Order extending the date for submission of the Final Presentence Report for at least forty-five (45) days. The grounds for this motion are set forth in the attached memorandum.

Respectfully submitted,

/s/ Alan J. Pfeuffer

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Attorney for Defendant
E. Stanley Hoff

MEMORANDUM IN SUPPORT OF MOTION

On October 24, 2017, Mr. Hoff entered a plea of guilty to a one-count Indictment; which, charged him with Threatening a United States Official, in violation of 18 U.S.C. §§115(a)(1)(A), (a)(1)(B), and (b)(4). (R.27, Plea Agreement).

On December 20, 2017, Defendant's prior counsel filed an identical motion and sought a thirty (30) day extension in which to file objections to Defendant's Initial Presentence Report. (R.34, Unopposed Motion to Extend Time for Submission of Objections and the Final Presentence Report).

On December 21, 2017, this Court granted Defendant's motion, and extended the deadline for the submission of objections to February 9, 2018. (R.___, Notation Order).

On January 11, 2018, Defendant's prior counsel filed a Motion to Withdraw as Mr. Hoff's court appointed counsel (R.35, Motion to Withdraw as Counsel); and, on January 30, 2018, this Court granted that motion and appointed undersigned counsel to represent Mr. Hoff. (R.36, Order).

Undersigned counsel has been diligent in reviewing Mr. Hoff's Initial Presentence Report and in meeting with Mr. Hoff; however, Mr. Hoff's transfer to the Correctional Center of Northwestern Ohio, a three hour drive north of Columbus, has delayed the

formation and submission of his objections to his Initial Presentence Report.

For the above cited reasons, undersigned counsel respectfully requests a thirty (30) day extension of the February 9, 2018 deadline established for the submission of objections to Defendant's Initial Presentence Report. Assistant United States Attorney Kevin Kelly does not oppose this motion

Respectfully submitted,

/s/ Alan J. Pfeuffer

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CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was electronically served upon Kevin Kelly and Noah Litton, Assistant United States Attorneys, Office of the United States Attorney, 303 Marconi Blvd., Suite 200, Columbus, Ohio 43215, on February 5, 2018.

/s/ Alan J. Pfeuffer
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Attorney for Defendant
E. Stanley Hoff